

3 PAGES

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 Wells Fargo Vendor Financial Services, LLC

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE DISTRICT
 dba TULARE REGIONAL MEDICAL
 CENTER,

Debtor.

Case No. 17-13797-B-9

Chapter 9

DC No: BPC-001

**NOTICE OF MOTION FOR ORDER
 (A) COMPELLING ASSUMPTION OR
 REJECTION OF EQUIPMENT LEASES;
 AND (B) DIRECTING PAYMENT OF
 POST-PETITION ADMINISTRATIVE
 RENT OR, ALTERNATIVELY, (C)
 TERMINATING THE AUTOMATIC
 STAY**

Date: August 2, 2018
 Time: 9:30 a.m.
 Dept: B
 Place: Courtroom 13, 5th Floor
 2500 Tulare Street
 Fresno, CA 93721

1 **TO THE HONORABLE RENÈ LASTRETO II, UNITED STATES BANKRUPTCY**
2 **JUDGE; DEBTOR TULARE LOCAL HEALTHCARE DISTRICT, ITS COUNSEL OF**
3 **RECORD, THE OFFICE OF THE UNITED STATES TRUSTEE; AND ALL**
4 **INTERESTED PARTIES:**

5 **PLEASE TAKE NOTICE** that the hearing on the Motion for an Order (A) Compelling
6 Assumption or Rejection of Equipment Leases and (B) Directing Payment of Post-Petition Rent
7 or, Alternatively, (C) Terminating the Automatic Stay (the “Motion”) filed by Wells Fargo
8 Vendor Financial Services, LLC (“WVFS”), will be held on August 2, 2018 at 9:30 a.m. in the
9 courtroom of the Honorable Renè Lastreto II, located at 2500 Tulare Street, Department B,
10 Courtroom 13, Fifth Floor, Fresno, California. By the Motion, WVFS moves the Court for entry
11 of an order compelling Tulare Local Healthcare District dba Tulare Regional Medical Center (the
12 “Debtor”) to assume or reject certain equipment leases into which the Debtor entered with
13 WVFS pre-petition and directing the Debtor to pay WVFS post-petition administrative rent or,
14 alternatively, granting WVFS relief from the automatic stay to allow WVFS to pursue its state
15 law rights and remedies under the equipment leases.

16 The Motion is based upon this Notice, the Motion, the Declaration of Lisa K. Boddicker
17 in support of the Motion, and the exhibits in support thereof, each filed concurrently herewith,
18 together with such additional records, documents, evidence and oral argument of counsel as may
19 be presented at the time and place of the hearing.

20 **PLEASE TAKE FURTHER NOTICE** that pursuant to Local Bankruptcy Rule 9014-
21 1(f)(1)(B), any opposition to the granting of the Motion shall be in writing and shall be served
22 and filed with the Court by the responding party at least fourteen (14) days preceding the date or
23 continued date of the hearing. You must also serve a copy of your opposition to the Motion upon
24 WVFS’s counsel at the mailing address indicated in the upper left corner of this Notice and on
25 the Office of the United States Trustee located at 2500 Tulare Street, Suite 1401, Fresno, CA
26 93721. Failure to file timely written opposition may be deemed a waiver of any opposition to the
27 granting of the Motion.

28 **PLEASE ALSO TAKE FURTHER NOTICE** that responding parties may determine

1 whether the Motion has been resolved without oral argument or whether the Court has issued a
2 tentative ruling, and view (any) pre-hearing dispositions by checking the Court's website at
3 www.caeb.uscourts.gov after 4:00 p.m. the day before the hearing, and any party appearing
4 telephonically must view the pre-hearing dispositions prior to the hearing.

5 DATED: June 29, 2018

BUCHALTER
A Professional Corporation

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8 By: /s/ Jeannie Kim
JEANNIE KIM
9 Attorneys for Movant
10 Wells Fargo Vendor Financial Services, LLC
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